ATTORNEYS AT LAW

MEMPHIS, TENNESSEE . JACKSON, MISSISSIPPI . LITTLE ROCK, ARKANSAS . JACKSON, TENNESSEE ______ REGULATORY AUTH.

August 23, 2000

'00 AUS 24 PM 1 16

OFFICE OF THE EXECUTIVE SECRETARY

VIA FEDERAL EXPRESS

Ms. Deborah Webb Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Total Environmental Solutions, Inc./In re: Rivera Utilities of

Tennessee, Inc.; Docket Number 00-00511

Dear Ms. Webb:

As per our telephone conversation this morning, please find enclosed twelve (12) copies of our response to Mr. Waddell's data request. You had received the original response dated August 21, 2000, by Federal Express, on August 22, 2000. I apologize for not including these copies in our August 21st mailout, and we will certainly do better next time.

As to the confidentiality of the collective exhibits, Ms. Laizure has spoken with our client, and it was decided not to mark the exhibits as being confidential. Therefore, I have not put the exhibits in individual envelopes, but attached a copy of each to the response. I would appreciate it if you would stamp one of the copies "filed," and return it to our office in the enclosed self-addressed, stamped envelope.

If you have any questions regarding the enclosed, or if you or Mr. Waddell need additional information, please do not hesitate to contact our office. Thank you for your patience and understanding in this matter.

Sincerely,

Karen J. Pratt

Assistant to Kathy Laughter Laizure, Esq.

Karen J. Wratt

Enclosures

K:\KLL\LTRS\TESI\webb.823

THOMAS R. PREWITT RICHARD H. ALLEN THOMAS F. JOHNSTON ELMORE HOLMES, III RONALD M. HARKAVY RAYMOND M. SHAINBERG⁶ W. ROWLETT SCOTT CARL H. LANGSCHMIDT, IR. ROSS B. CLARK II ALAN L. KOSTEN ALAN L. KOSTEN JOSEPH B. WALKER THOMAS R. PREWITT, JR. CHARLES A. BANKS² MICHAEL D. KAPLAN ROBERT V. REDDING PRINCE C. CHAMBLISS, JR.⁵
ALLEN C. DUNSTAN PAUL A. MATTHEWS RANDALL D. NOEL³ MARK S. NORRIS JAMES R. HALL, JR.³ B. DOUGLAS EARTHMAN MICHAEL B. NEAL HENRY C. SHELTON, III KEN COOK² V. ELLEN MORRIS¹ JAMES B. MCLAREN, JR. JEROME A. BROADHURST CHARLES R. CRAWFORD JAMES L. PETTIS, III¹ LUCIAN T. PERA NEIL HARKAVY BOBBY M. LEATHERMAN³ CANNON F. ALLEN S. W. FARNSWORTH, III ALAN M HARKAVY HEBER S. SIMMONS, III³ THOMAS W. LEWIS KATHY LAUGHTER LAIZURE

MARTIN W. BOWEN² JONATHAN O. STEEN EUGENE E. TIBBS, JR. STEVEN R. REGENWETHER AUBREY L. BROWN, JR. AUBREY L. BROWN, JR.
DONNA L. BOYCE³
LAWRENCE B. AUSTIN³
JASON G. YARBRO
W. BRYAN SMITH
SARA FALKINHAM MAXWELL^{3, 4} C. YORK CRAIG, III¹ PARKE S. MORRIS DANIEL W. VAN HORN E. B. CHILES, IV⁴ PAUL H. WOOD² CLOVER S. PITTS KAREN B. HALL ELENI N. VATSIS³ AMY M. PEPKE LARRY D. ALLEN' BRIAN S. FAUGHNAN TINA L. NICHOLSON MARY KATHERINE HOVIOUS GREGG C. GUMBERT

OF COUNSEL: LAURIE A. COOPER GAVIN M. GENTRY STEVE R. GRABER⁶ EDWARD M. KAPLAN G. THOMAS MCPHERSON³
I. DRAYTON PRUITT, JR.⁵
HELEN WETHERBEE¹

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MISSISSIPPI
ARKANSAS

NEW YORK



ARMSTRONG ALLEN, PLLC ATTORNEYS AT LAW

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MEMPHIS, TENNESSEE - JACKSON, MISSISSIPPI - LITTLE ROCK, ARKANSAS - JACKSON, TENNESSEE 24 PM 1 16

August 21, 2000



VIA FEDERAL EXPRESS

Mr. K. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Re: Total Environmental Solutions, Inc.

Dear Mr. Waddell:

The following is in response to your data request that was addressed to Frank Garrison of our firm, as counsel for Total Environmental Solutions, Inc. ("TES"). This request was relating to the "Petition of TES and South Louisiana Electric Cooperative Association (SLECA) for Transfer of Certificate of Public Convenience and Necessity to Provide Utility Services or for Determination as to its Qualification to Operate Sewerage/Wastewater Treatment Facilities." Mr. Garrison has recently left our firm to move back to Jackson, Mississippi, and I will be taking over his work on this matter. Please feel free to call me at the numbers below, or Brandon Black, at the law firm of Taylor, Porter, Brooks & Phillips in Baton Rouge, Louisiana at (225) 381-0247, if you have any further questions with regard to these responses.

1. Will the Staff who oversees provisions of sewerage/wastewater treatment services change as a result of this transaction?

Employees of Riviera Utilities of Tennessee, Inc. will undergo a 90-day evaluation, at which time TES will evaluate each employee's performance and make its decisions whether to retain or to terminate each employee on an individual basis.

2. Provide a detailed explanation of TES qualifications to operate a sewerage/wastewater treatment system. Include background information on other systems operated by TES as well as the qualifications of the TES staff to operate the Riviera Utilities system.

MARTIN W. BOWEN²
JONATHAN O. STEEN
EUGENE E. TIBBS, JR.
STEVEN R. REGENWETHER
AUBREY L. BROWN, JR.
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OF COUNSEL: LAURIE A. COOPER GAVIN M. GENTRY STEVE R. GRABER⁶ EDWARD M. KAPLAN G. THOMAS MEPHERSON³ I. DRAYTON PRUITT, JR. ⁵ HELEN WETHERBEE¹

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5 ALABAMA

6 NEW YORK

Mr. K. David Waddell August 21, 2000 Page 2

SLECA, TES's parent and the entity supplying most of TES's management, has been operating as a regulated electric utility for over 62 years. SLECA has invaluable experience in areas such as regulatory issues, rate making, customer service, purchasing and warehousing, billing, budgeting, and general utility management. SLECA has not sought an electric rate increase since 1983. SLECA has an excellent reputation in Louisiana, and interested parties are encouraged to inquire of SLECA's reputation with the Louisiana Public Service Commission.

Regarding its wastewater and water utility operations, TES has hired Bill Schoening to manage its Tennessee utility. Mr. Schoening has 18 years experience in operating and managing wastewater and water utilities, and has an excellent reputation in the industry. Mr. Schoening has been the manager of this utility for the past several years and has been at odds with Glen Johnson, the former owner of these utilities, in trying to improve service and perform repairs. Mr. Schoening was retained by the trustee of the estate of Johnson Properties because of his expertise. He is not affiliated in any way with the former owners of Johnson Properties, Inc., and TES has the utmost confidence in his abilities. In addition, TES has hired independent contracting firms to assist them with repairs of the sewerage systems. TES has also hired independent contracting firms to perform all water testing services and engineering services.

3. Please explain your corporate business model and how it will be applied to the operation of Riviera Utilities of Tennessee. Please include a list of companies TES operates and how long it has operated them.

TES is a subsidiary of SLECA. TES will own all of the water and wastewater utilities formerly owned by Johnson Properties, including Riviera Utilities of Tennessee. TES will have no subsidiaries.

4. Have any companies owned by TES or SLECA ever filed for bankruptcy or gone out of business?

No.

5. Is National Cooperative Services Corporation (or its parent, The National Rural Utilities Cooperative Finance Corporation) affiliated with TES or SLECA in any way?

No. The National Cooperative Services Corporation is a governmental organization that provides financing to electric cooperatives throughout the United States.

Mr. K. David Waddell August 21, 2000 Page 3

6. What are the terms of the loan obtained from the National Cooperative Services Corporation for the purposes of purchasing Johnson Properties (and its subsidiary, Riviera Utilities of Tennessee)?

The loan from NCSC is in the amount of \$8.0 million at 8.5%, payable in 240 fixed, monthly installments over 20 years.

7. What effect will this loan have on the current customers of Riviera Utilities?

The loan should have no effect on the current customers of Riviera Utilities. Once TES takes over these operations, TES plans to study the rate of return at Riviera Utilities to determine whether a rate increase is warranted. Such a rate increase would, of course, affect the customers of Riviera Utilities, but such would have to be approved by the Tennessee Regulatory Authority and be fully supported by appropriate evidence.

8. Please provide income statements and balance sheets for TES for the last three years.

TES was recently formed by SLECA to purchase the Johnson Properties' assets. There are, therefore, no income statements and balance sheets at this time. Attached, however, are pro forma income statements and balance sheets for TES (collective Exhibit 1), which were compiled based on TES's best estimates. Also attached are the most recent income statement and balance sheet of SLECA (collective Exhibit 2).

9. Are you familiar with the rules and regulations of the T.R.A. (as they relate to the following reports and to service/quality standards)?

Expertise in this regard will be provided by Bill Schoening, who has been hired by TES to operate Riviera Utilities of Tennessee, and other utilities in Pennsylvania, North Carolina, and South Carolina. In addition, TES has retained this law firm to assist in this regard.

10. Are you familiar with the current service territory and rates and charges of Riviera Utilities? Is TES requesting any change in rates or rate structure for customers of Riviera Utilities of Tennessee at this time?

TES is familiar with the current service territory, rates and charges of Riviera Utilities of Tennessee. With regard to a change in rates, understand that TES is acquiring 249 water and wastewater utilities from the bankruptcy estate of Johnson Properties, located in Tennessee, North Carolina, South Carolina, Mississippi, Louisiana, and Pennsylvania. The majority of the utilities are located in Louisiana where significant environmental problems exist. TES is presently pursuing a rate case in Louisiana, but is not requesting a change in rates or rate structure at this time in Tennessee. After having a chance to study same, however, TES may

Mr. K. David Waddell August 21, 2000 Page 4

request a change in rates. If warranted, such a request would be forthcoming within the next 12-18 months.

11. Provide a summary of your company's plans for Riviera Utilities as they relate to improvements, maintenance, and customer charges.

It is TES's understanding that no improvements are necessary at this time. Daily maintenance on the facility will be conducted by Robert Scott. See responses above regarding customer charges.

12. Has TES applied for the proper permits from the Tennessee Department of Environment Conservation?

TES is in the process of gathering information to apply for any such needed permits. This law firm is assisting TES with the permit transfer.

If you have any questions, or if you need additional information with regard to the above, again, please do not hesitate to call me or Brandon Black.

Sincerely yours,

Kathy I aughter Laizure

KLL/kp Enclosures

cc: Mr. Brandon Black

Mr. Paul Maeder

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As of the Year Ending:						
Arrett	Year l	Year 2	Year 3	Year 4	Year 5	Year 6
Current Austr				776 7ka c	5.041.156	6.245,946
Carthern Assess	1,178,476	1,426,786	2,631,576	3,836,360	00	0
Investments	0	0	0	c	(
Accounts Receivable)	כ	0	0	0	
Notes Receivable	0	c	ţ			
Inventory	.	o	0	0	0	
Other Current Assets		1 126 786	2 631 576	3.836.366	5,041,156	6,245,946
Total Current Assets	1,178,476	1,426.780	6,001,770			
Plant & Equipment		100 000	100.000	100,000	100,000	100,000
Land	300,000	200,000	200,000	200,000	200,000	200,000
Bulldings	200,000	200,000	: !			
Building/Leaschold Improvements		3 150 000	3.150.000	3,150.000	3,150,000	3,150,000
Machinery & Equipment	3,150,000	3,150,000	4,700,000	4,700,000	4,700,000	4.700,000
Renovations	2,350,000	4./00,000				
Automobiles		016 930	1 224 330	.1.632,440	-2.040,550	-2,448,660
Less Accumulated Depreciation	-408,110 5,391,890	7,333,780	6,925,670	6,517,560	6.109,450	5,701,340
10(9) tace i jane es estas beresen			ı	•		
Other Assets	0	0	c	· ·	,	
Total Assets	6,570,366	8,760.566	9,557,246	10,353,926	11,150.606	11,947.286
Liabilities & Owners' Equity						
Current Liabilities						
Shon Term Debt						
Accounts Payable						
Other Payables						
Accrued Liabilities	o	0	0	0	0	
Total Current Liabilities						1
Town Debt	7,170,635	8,646,998	8,418,432	8,172,030	7,906.227	7,619,321
Total Liabilities	7,170,635	8,646,998	8,318,432	0,1,2,000	;	
Owner/Stockholder Equity						
Comunon Stock			1 128 813	2.181.895	3,244,378	1.327.964
Retained Earnings	.600,270	113,507	***************************************			
Less Dividends Payable		795 E11	1,138,813	2,181,895	3.244.378	4.327.964
Total Owners' Equity	-600,270		1			<u>:</u>
	6,570.365	8,760,565	9.557,245	10,353,925	11,150,605	882.744.11

collective Exhibit 1 **EXHIBIT**

8/7/00

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(1)

Profit and Loss Projections

Ciruss Margins \$	Total Operating cost 5	Insurance	Projectly lax 5	Depreciation \$	Bad debts \$	Management fees \$	Billing & Collecting \$	replacement pumps \$	Electricity	1A monthly testing \$	MS mondily testing \$	Monthly Water testing \$	Training Cost \$	Daily water checks \$	Shidge treatment \$	Pipe crew MS water \$	Flow meters \$	Chlorine 3	Contractor cost 3	Operating Costs:	Interest payment \$	Direct Cost:	Revenue loss S	Total Revenue S	Trady sewer income	yearly water income	Revenue by source	Sewer rate	Waler tale		Savier accounts	Water accounts	
(600,270) \$	7,030,707 \$	195,857 \$	95,738 \$	408,110 \$	27,912 \$	139,559 \$	648,240 \$	40,500 \$	1,170,674 \$	115,992 \$	14,256 \$	27,216 \$	\$ 000,01	46,656 \$	22,382 \$	269,568 \$	62,250	680,147 \$	3,055,650 \$		547,537 \$			6,977,975	4,750,444 \$	2,227,531 \$		various	various	•	17.270	9,740	Year 1
713,837	7,002,377	195,857	95,738	408,110 \$	33,565	167,826 \$	648,240 \$	40,500 \$	1,170,674 \$	115,992 \$	14,256 \$	27,216 \$	10,000 \$	46,656 \$	22,382 \$	269,568 \$		680,147 \$	3,055,650 \$	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	675,093			8,391,307 \$	5,023,707 .	2,467,510 \$		various	various		17.270	9,740	Year 2
1,025,246	7,010,844	195,857	95,738	408,110	34,976	174,882	648,240	40,500	1,170,674	115,992	14,256	27,216	10,000	46,656 \$	22,382	269,568		680,147 3	3,033,630		708,000	1		8,744,090 \$	6,216,840 \$			various	various		17.270	9,740	· Year 3
\$ 1,043,082	\$ 7,010,844	\$ 195,857	\$ 95,738	\$ 408,110	34,976	\$ 174,882	648,240	\$ 40,500	1,170,674	115,992	14,256	27,216	10,000	46,656	22,382	269,568	· ·	680,147	3,055,650 3	3 0 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	690,164 3			8,744,090 \$	6,216,940	2,527,250		various	VALIOUS		17,270	9,740	Year 4
\$ 1,062,483	\$ 7,010,844	\$ 195,857	9 5,738	5 408,110	34,9/6	\$ 174,882	\$ 648,240	\$ 40,500	S 1,170,674 \$	\$ 115,992 \$	3 14,256 \$	27,216	10,000 3	16,656	22,382	269,568 3		680,147	3,033,030	3055 650	0/0,/03			8,744,090 5	6,216,840	2,527,250		various	VALIOUS		17,270	9.740	Year 5
\$ 1,083,586	\$ 7,010,844	3 195,857	\$ 95,738	3 408.110	34,7/6	31.4,882	5 648,240	\$ 40,500	\$ 1.170.674	\$ 115,992	\$ 14,256	\$ 27,216	\$ 10,000	\$ 46,656	3 22,382	3 269,568		9 080,147	3 3,033,030	3 0 6 8 6 5 0	9 049,000			B.744.090				various	Various		17,270	9,740	Year 6

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4,327,965

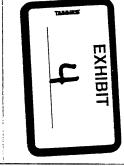
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	Gross Margins \$	Total Operating cost \$	Insurance S	Property tax \$	Depreciation -	Rad Johts	Management fees	replacement pumps	piecultry S	Electricity	Monthly Water testing	Training Cost \$	Flow meters 5	Chlorine \$	Operating Costs: Contractor cost \$	Direct Cost: Interest payment 5	Revenue loss		Revenue by source	Water rate	Water accounts	
	(20,631) \$	101,197 \$	50,000 S	958 S	2,761 \$	334 \$	1.670	25.200 \$	2,000 \$	4.702 \$	15 \$	1,000 \$	250 \$	36 \$	12,272 \$	2,909		83,473 3		various	1,050	Year l
	91,334 \$	103,953 \$	50,001 \$	958 \$	2,761 \$	793 \$	3,963 \$	25,200 \$	2,001 \$	4,702 \$	15 \$	1,001 \$	251 \$	36 \$	12,272 \$	20,200		170,133	100125	various	1,050	Үем 2
	119,373	104,645 \$	50,002 S	958 \$	2,761 \$	907 \$	4,536 \$	25,200 \$	2,002 \$	4,702 \$	15 \$	1,002 \$	252 \$	36 S	12,272 \$	2,782 \$			77 6 800 S	various	1,050	Year 3
	119,441 \$	104,649 \$	50,003 \$	958 \$	2,761 \$	907 S	4,536 \$	25,200 \$	2,003 \$	4,702 \$	15 \$	1,003 \$	253 \$	36 \$	12.272 \$	<u>2,710 \$</u>			226.800 S	various	1,050	Year 4
&	119,515 \$	104,653 \$	50,004 \$	958 \$	2,761 \$	907 \$	4,536 \$	25,200 \$	2,004 \$	4,702 \$	15	1,004 \$	254 \$	36 \$	12,272 \$	2,632 \$			226.800 S	various	1,050	Year 5
548.627	119,596	104,657	50,005	958	2,761	907	4,536	25,200	2,005	4,702	15	1,005	255	36	12,272	2,547			226.800	various	1,050	Year 6



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		LA 8, TERREBONNE	ļ <u></u>
FINANCIAL AND STATISTICAL R	EPORT	PERIOD ENDED	RUS USE ONLY
		UNE 00, 0000	****
STRUCTIONS - See RUS Bulletin 17178-2	DART C. DAI	JUNE 30, 2000	
ASSETS AND OTHER DEBIT		ANCE SHEET LIABILITIES AND OTHER CRE	DITS
			69,37
Total Utility Plant in Service		-	27,946,63
Construction Work in Progress		32. Operating Margins - Prior Years	
Total Utility Plant (1+2)		33. Operating Margins - Current Year	605,32
Accum, Provision for Depreciation & Amort		33. Operating Margins - Content Four-	943,86
Net Utility Plant (3 - 4)			196,02
Non-utility Property - (Net)	23,810	36. Total Margins & Equities (30 thru 35)	29,761,21
Investments in Subsidiary Companies	0	37 Long-Term Debt REA (Net)	21,703,31
Invest, in Assoc. Org Patronage Capital	418,930	(Payments - Unapplied \$)	2.11.031
Invest in Assoc Org - Other - Gen Funds	0	→ · · · · · · · · · · · · · · · · · · ·	
). Invest in Assac Org - Other - Nongen Funds	1,494,579	38 Long-Term Debt - RIEA - Econ. Devel (Net)	
I, Investments in Economic Devel. Projects		39. Long-Term Debt - Other - REA Guaranteed	7,267,74
2. Other Investments		40. Long-Term Debt Other (Net)	28,971,05
3 Special Funds		41. Total Long-Term Debt (37 thru 40)	20,071,00
Total Other Property and Invest.(6 thru 13)			3,329,50
5. Cash - General Funds			3,329,50
6. Cash - Construction Funds - Trustee	9,000	44. Total Other Noncurrent Liabilities (42+43)	0,020,00
7 Special Deposits		45. Notes Payable	2,162,59
8. Temporary Investments		46. Accounts Payable	763,20
9. Notes Receivable - Net		47 Consumers Deposits	1,327,49
Accounts Receivable - Sales of Energy (Net)		49. Total Current & Accided Liabilities (45 thru 48)	
Accounts Receivable - Other (Net)		7	1
Materials and Supplies - Electric and Other		1	
3. Prepayments		→	
4. Other Current and Accrued Assets	0	╡	66,322,03
5. Total Current and Accrued Assets (15 thru 24)	15,049,867	(36+41+44+49 thru 51)	
6 Regulatory Assets		₹	4,265,50
7. Other Deferred Debits		53. Balance Beginning of Year54. Amount Received This Year (Net)	45,88
8. Accumulated Deferred Income Taxes			4,311,39
9. Total Assets and Debits (5+14+25 thru 28)	66,322,034		7,011,0
PART D.		FINANCIAL STATEMENTS	PORT
		TO THE FINANCIAL STATEMENT CONTAINED IN THIS REF	
EPORTITEMS CONTAINED IN THE INSTRUCTIONS AND			
A SEPARATE SHEET MAY BE USED IF ADDIT	IONAL SPACE	IS NEEDED.)	
i e e e e e e e e e e e e e e e e e e e			

EXHIBIT collective Exhibit 2 to nearest dollar See RUS Bulletin 17178-2

USDA - RUS

FINANCIAL AND STATISTICAL REPORT

LOUISIANA 8 TERREBONNE

BORROWER NAME AND ADDRESS

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION

P. O. BOX 4037 2028 COTEAU ROAD

504

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PERIOD ENDED

JUNE 30, 2000

HOUMA, LOUISIANA 70361

RUS USE ONLY

RUCTIONS - Submit an original and two copies to RUS. Round all amounts

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY PART 1788 OF 7 CFR CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

e Manager or Accountant

		Signature of Manager		-	Date	:
			STATEMENT OF O	PERATIONS		
		171117.	0,7112,1112,111 0, 0	YEAR-TO-DATE		THIS MONTH
	ITEM		LAST YEAR	THIS YEAR	BUDGET	
			(a)	(b)	(c)	(d)
1.	Operating Revenue & Pa	tronage Capital	13,583,009	13,191,303	13,530,458	2,750,519
2.	Power Production Expen					
3.	Cost of Purchased Powe		8,811,425	8,078,301	8,854,866	1,548,402
4.	Transmission Expense		22,380	23,180	21,953	4,733
5.	Distribution Expense-Op		687,119	765,86()	738,738	117,691
6.	Distribution Expense - M		545,736	583,727	604,989	90,294
7.	Consumer Accounts Exp		361,288	431,679	404,947	70,879
8.	Customer Service & Info		85,875	81,216	102,517	14,153
q	Sales Expense		9,775	9,354	9,081	1,446
	Administrative & Genera	Expense	874,624	918,571	979,970	138,558
11.	Total Operation & Maint		11,398,222	10,891,888	11,717,061	1,986,156
12.	Depreciation & Amort. E		931,424	958,326	960,000	160,546
13.	Tax Expense-Property &		24,672	27,384	27,000	4,564
14.	Tax Expense-Other		8,328	8,133	9,000	5,463
15.	Interest on Long-Term D		703,333	667,433	720,000	114,459
16.	Interest Charged to Cons	st Credit.				,
17.	Interest Expense - Other		15,000	27,756	16,200	3,200
18.	Other Deductions		5,483	5,350	9,027	612
19.	Total Cost of Electric Se		13,086,462	12,586,270	13,458,288	2,275,000
20.	Patronage Capital & Ope					
			496,547	605,033	72,170	475,519
21.	Non Operating Margins		255,384	316,360	193,500	7,676
22.	Allow, for Funds Used D					
23.		ty Investments		:		
24.		· Other	16,989	7,386	6,600	1,585
25.	Generation & Transmiss					
26	Other Capital Credits & I		0	288	0	0
27.			10,320		13,055	73,834
28		ins (20 thru 27)		1,549,182	285,325	558.614
<u> </u>	. 2001495 040. 01 11449	PART B DATA ON		D DISTRIBUTION PL		
		YEAR-TO			YEAR-TO	D-DATE
	ITEM	LAST YEAR	THIS YEAR	ITEM	LAST YEAR	THIS YEAR
		(a)	(p)		(a)	(b)
1.	New Serv. Connected	270		5. Miles Transmis.	29	29
2	Services Retired	114		6. Miles DistO/H	1,080	1,088
						170

18,972

1,733

8. Total Miles

Energized(5+6+7)

19,390 7. Miles Dist.-U/G

1,803

RUS Form 7 (Rev 6-94)

Idle Services

(Exclude Seasonal)

Total Services in Place

EXHIBIT

162

1,271

173

1,290